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 Defendant

FILED
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 U.S. DISTRICT COURT
 EASTERN DISTRICT OF MICHIGAN

**U.S. District Court
 Eastern District of Michigan**

**FATHERS & DAUGHTERS
 NEVADA, LLC,**

Plaintiff,

v.

LIONEZ L. KIMBER,

Defendant.

Case No. : 4:16-cv-10372-TGB-APP

ANSWER

JURISDICTION AND VENUE

In response to Plaintiff's complaint, Defendant responds as followed:

1. In response to paragraph one of Plaintiff's complaint, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
2. In response to paragraph three, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
3. In response to paragraph three, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
4. In response to paragraph four, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
5. In response to paragraph five, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
6. In response to paragraph six, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
7. In response to paragraph seven, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
8. In response to paragraph eight, Defendant is without sufficient information to either admit or deny the remaining allegations contained therein and therefore deny them.
9. In response to paragraph nine, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.

10. In response to paragraph ten, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.

THE PARTIES

11. In response to paragraph eleven, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
12. In response to paragraph twelve, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
13. Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
14. In response to paragraph fourteen, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
15. In response to paragraph fifteen, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
16. In response to paragraph sixteen, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
17. In response to paragraph seventeen, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
18. In response to paragraph eighteen, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
19. In response to paragraph nineteen, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
20. In response to paragraph twenty, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
21. In response to paragraph twenty, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
22. In response to paragraph twenty-one, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
23. In response to paragraph twenty-three, Defendant admits the allegations contained therein.
24. In response to paragraph twenty-three, Defendant admits the allegations contained therein.
25. In response to paragraph twenty-five, Defendant admits to all allegations contained therein.
26. In response to paragraph twenty-six, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
27. In response to paragraph twenty-eight, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
28. . In response to paragraph twenty-nine, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
29. In response to paragraph twenty-nine, Defendant admits that the Plaintiff is the exclusive owner of the copyright and/or the pertinent exclusive rights under the United States but is without sufficient information to either admit or deny

all remaining allegations contained therein and therefore deny them.

Count 1
Copyright Infringement

30. Defendant restates and incorporates by reference the answers set forth in paragraph 1-29 as if stated therein.
31. In response to paragraph thirty-one, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
32. In response to paragraph thirty-two, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
33. In response to paragraph thirty-three, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
34. In response to paragraph thirty-four, Defendant admits the allegations contained therein.
35. In response to paragraph thirty-five, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
36. In response to paragraph thirty-six, Defendant admits to having the assigned IP (Internet Protocol) address but is without sufficient information to either admit or deny all remaining allegations contained therein and therefore deny them.
37. In response to paragraph thirty-seven, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
38. In response to paragraph thirty-seven, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
39. In response to paragraph thirty-nine, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
40. In response to paragraph forty, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
41. In response to paragraph forty-one, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
42. In response to paragraph forty-two, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
43. In response to paragraph forty-three, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
44. In response to paragraph forty-four, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
45. In response to paragraph forty-five, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
46. In response to paragraph forty-six, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.

COUNT II

CONTRIBUTORY INFRINGEMENT

47. Defendant restates and incorporates by reference the answers set forth in

paragraph 1-46.

48. In response to paragraph forty-eight, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them.
49. In response to paragraph forty-nine, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them
50. In response to paragraph fifty, Defendant is without sufficient information to either admit or deny all allegations contained therein and therefore deny them

Respectfully Submitted,
Lionez L. Kimber (President)
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DATED: June 6, 2016

